

**REMARKS**

Claims 1-29 are pending in this application. Claims 1, 3, 5, 10, 12, 13, 15, 16, 17, 22, 25, 26, and 28 are amended herein. Support for the amendments to the claims may be found in paragraph [0032] of the specification. This amendment is believed to place the application in condition for allowance, and entry therefore is respectfully requested. In the alternative, entry of this amendment is requested as placing the application in better condition for appeal by, at least, reducing the number of issues outstanding. Further reconsideration is requested based on the foregoing amendment and the following remarks. Reconsideration is requested based on the foregoing amendment and the following remarks.

**Response to Arguments:**

The Applicants appreciate the consideration given to their arguments. The Applicants, however, are disappointed that their arguments were not found to be persuasive. The final Office Action asserts in lines 4, 5, and 6 of section 3, at page 2, that:

Examiner respectfully disagrees because Black teaches (a) the situation, specified as the security event exceeding the respective pre-determined threshold, is qualified as "the security status" as claimed.

This is submitted to be incorrect. The recited "security status of an appliance" is the *status* of the security of the appliance. The situations in Black, on the other hand, have been summarized, which takes time. Since it takes time to summarize the situations in Black, the situations had to have happened in the *past*, and are no longer representative of the *status* of the system. In particular, as described in paragraph [0035]:

The techniques of the present invention allow information about potential security violations to be summarized and presented to a user in a concise and easy to understand format.

Situations that occurred in the past are not about "the security status of an appliance." The situations in Black, rather, will no longer be current after, as in Black, the events have been abstracted into a set data-type identifying the source, target, and category of the event, the sets with common elements have been grouped together, and those set-groups having a severity exceeding a threshold have been designated "situations," as described in paragraph [0010].

Still, in the interest of compact prosecution only, and not for any reason of patentability, the recitation "security status" has been defined further as a "current security status."

The final Office Action asserts further in lines 7-11 of section 3, at page 2, that:

(b) Examiner notes "displayed the situations to an administrator", as taught by Black, must use an external display so that somehow in any way, it can be presented to the administrator (i.e. data in computer memory is not tangible to a human) and as such Black does teach an external display to display the security status of the appliance directly on an outside of the appliance.

This is also submitted to be incorrect. Even though, in Black, those set-groups having a severity exceeding a threshold are presented to a user or administrator, there is no description in Black of presenting them "*directly* on an outside of the appliance," as recited in claim 1, with emphasis added.

The final Office Action asserts further in lines 11 and 12 of section 3, at page 2, that:

(c) Black teaches "the internal event log identified as the format of (SRC, TARGET, CLASS) is considered as an internal display".

This is also submitted to be incorrect. Neither the source, the target, nor the class can be considered to be a "security status," as discussed above. In Black, rather, events are abstracted into a set data-type identifying the source, target, and category of the event, as described in paragraph [0010]. By the time the events have been abstracted, it will be too late for them to represent a *status* of security. Further reconsideration is thus requested.

#### **Claim Rejections - 35 U.S.C. § 102:**

Claims 1-4, 6-9, 11-16, 18-21, 23-27, and 29 were rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent Application Publication No. 2003/0041264 to Black et al. (hereinafter "Black"). The rejection is traversed to the extent it might apply to the claims as amended. Reconsideration is earnestly solicited.

The third clause of claim 1 recites:

An external display to display the current security status of the appliance directly on an outside of the appliance.

Black neither teaches, discloses, nor suggests "an external display to display the current security status of the appliance directly on an outside of the appliance," as recited in claim 1. In Black, rather, those set-groups having a severity exceeding a threshold are presented to a *user* or *administrator*, not "directly on an outside of the appliance," as recited in claim 1. In particular, as described at paragraph [0010]:

The present invention provides a method, computer program product, and apparatus for presenting data about security-related events that puts the data into a concise form. Events are abstracted into a set data-type identifying the source, target, and category of the event. Sets with common elements are grouped

together, and those set-groups having a severity exceeding a threshold are designated "situations." The situations are then presented to a user or administrator.

Since, in Black, only those set-groups having a severity exceeding a threshold are presented to a user or administrator, Black has no "external display to display the current security status of the appliance directly on an outside of the appliance," as recited in claim 1.

Moreover, in Black, *groups* that exceed their respective pre-determined thresholds are displayed as situations to a user or administrator, not the current security status, contrary to the assertion in section 4, at page 4 of the final Office Action. In particular, as described at paragraph [0050]:

Finally, groups that exceed their respective pre-determined thresholds are displayed as situations to a user or administrator (step 910).

Since, in Black, groups that exceed their respective pre-determined thresholds are displayed as situations to a user or administrator, Black has no "external display to display the current security status of the appliance directly on an outside of the appliance," as recited in claim 1.

Black, finally, is directed toward the *concise* display of information relating to a series of security violations. In particular, as described at paragraph [0002]:

The present invention is directed toward presenting network security and intrusion information to a user. More specifically, the present invention provides a method, computer program product, and apparatus for concise display of information relating to a series of security violations.

Since Black is directed toward the concise display of information relating to a series of security violations, Black has no "external display to display the current security status of the appliance directly on an outside of the appliance," as recited in claim 1.

The fourth clause of claim 1 recites:

An internal display to display the current security status of the appliance within an inside of the appliance.

Black neither teaches, discloses, nor suggests "an internal display to display the current security status of the appliance within an inside of the appliance," as recited in claim 1. Black, rather, displays groups that exceed their respective pre-determined thresholds to a *user or administrator*, as discussed above, not "within an inside of the appliance," as recited in claim 1.

Black, finally, mentions no internal display at all, let alone an event log displayed internally, contrary to the assertion in the last full paragraph at page 3 of the final Office Action.

Black, rather, reports events aggregated into groups to a *user*. In particular, as recited at page 4, in claim 1:

Logging events by storing event attributes as an event set, wherein each event set includes a source attribute, a target attribute and an event category attribute; classifying events as groups by aggregating events with at least one attribute within the event set as an identical value; and calculating severity levels for the groups; reporting a group from the groups to a user as a situation, if a severity level of the group exceeds a threshold value.

Since Black reports events aggregated into groups to a user, Black has no "internal display to display the current security status of the appliance within an inside of the appliance," as recited in claim 1. Claim 1 is submitted to be allowable. Withdrawal of the rejection of claim 1 is earnestly solicited.

Claims 2, 3, 4, 6-9, 11, and 12 depend from claim 1 and add further distinguishing elements. Claims 2, 3, 4, 6-9, 11, and 12 are thus also submitted to be allowable. Withdrawal of the rejection of claims 2, 3, 4, 6-9, 11, and 12 is also earnestly solicited.

Claims 13-16, 18-21, 23, and 24:

The third clause of claim 13 recites:

Displaying the current security status of the appliance on an outside of the appliance.

Black neither teaches, discloses, nor suggests "displaying the current security status of the appliance on an outside of the appliance," as discussed above with respect to the rejection of claim 1.

The fourth clause of claim 13 recites:

Displaying the current security status of the appliance on an inside of the appliance.

Black neither teaches, discloses, nor suggests "displaying the current security status of the appliance on an inside of the appliance," as discussed above with respect to the rejection of claim 1. Claim 13 is thus submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 1. Withdrawal of the rejection of claim 13 is earnestly solicited.

Claims 14, 15, 16, 18-21, 23, and 24 depend from claim 13 and add further distinguishing elements. Claims 14, 15, 16, 18-21, 23, and 24 are thus also submitted to be

allowable. Withdrawal of the rejection of claims 14, 15, 16, 18-21, 23, and 24 is also earnestly solicited.

Claims 25, 26, 27, and 29:

The third clause of claim 25 recites:

An external display to display the current security status of the appliance directly on the an outside of the appliance.

Black neither teaches, discloses, nor suggests "an external display to display the current security status of the appliance directly on the an outside of the appliance," as discussed above with respect to the rejection of claim 1.

The fourth clause of claim 25 recites:

An internal display to display the current security status within the an inside of the appliance.

Black neither teaches, discloses, nor suggests "an internal display to display the current security status within the an inside of the appliance," as discussed above with respect to the rejection of claim 1. Claim 25 is thus submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 1. Withdrawal of the rejection of claim 25 is earnestly solicited.

Claims 26, 27 and 29 depend from claim 25 and add further distinguishing elements. Claims 26, 27 and 29 are thus also submitted to be allowable. Withdrawal of the rejection of claims 26, 27 and 29 is also earnestly solicited.

**Claim Rejections - 35 U.S.C. § 103:**

Claims 5, 17, and 28 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Black in view of U.S. Patent No. 6,910,135 to Grainger (hereinafter "Grainger"). The rejection is traversed to the extent that might apply to the claims as amended. Reconsideration is earnestly solicited.

Claims 5, 17, and 28 depend from claims 1, 13, and 25, respectively and add additional distinguishing elements. Black neither teaches, discloses, nor suggests "an external display to display the current security status of the appliance directly on an outside of the appliance" or "an internal display to display the current security status of the appliance within an inside of the appliance," as discussed above with respect to the rejection of claim 1. Grainger does not either, and thus cannot make up for the deficiencies of Black with respect to claims 5, 17, or 28.

Claims 5, 17, and 28 are thus also submitted to be allowable. Withdrawal of the rejection of claims 5, 17, and 28 is earnestly solicited.

Claims 10 and 22:

Claims 10 and 22 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Black in view of U.S. Patent Application Publication No. 2004/0049693 to Douglas (hereinafter "Douglas"). The rejection is traversed. Reconsideration is earnestly solicited.

Claims 10 and 22 depend from claims 1 and 13, respectively and add additional distinguishing elements. Black neither teaches, discloses, nor suggests "an external display to display the current security status of the appliance directly on an outside of the appliance" or "an internal display to display the current security status of the appliance within an inside of the appliance," as discussed above with respect to the rejection of claim 1. Douglas does not either, and thus cannot make up for the deficiencies of Black with respect to claims 10 and 22. Claims 10 and 22 are thus also submitted to be allowable. Withdrawal of the rejection of claims 10 and 22 is earnestly solicited.

**Conclusion:**

Accordingly, in view of the reasons given above, it is submitted that all of claims 1-29 are allowable over the cited references. Allowance of all claims 1-29 and of this entire application is therefore respectfully requested.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

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Respectfully submitted,

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